

I am an ARRL member – but I do not agree with the League on RM11306 so I feel the need to speak my mind directly to the FCC. I really don't know if Regulation by Bandwidth is a good thing or a bad thing. It seems to me it works for the most part in other countries because of informal "Gentleman's" agreements. If everybody plays nice it seems to work.

Problems I have with the current RM11306:

- 1.) PactorII and PactorIII stations don't seem to want to play nice at all. It was my understanding that in the Amateur Radio Service all frequencies are a shared resource. I've lost count of the number of times I've been trounced by PactorII/III stations on 40cw, 17cw and 20rtty while I was in the middle of a QSO. I understand that those operating these PCMB's use software to determine if a frequency is occupied before transmitting. Apparently the software isn't quite good enough yet, because the only signals that seem to keep a PaTorII/III station from firing up is another PacTor station already transmitting.
- 2.) If a distant station activates a PacTorII/III station operating under semi-automatic control, how does the distant station know that the station he just activated won't be interfering with ongoing QSO's that the distant station can't hear from his location?
- 3.) It's fairly easy to tell when your being interfered with by a PacTorII/III station but it is virtually impossible for the average everyday user of the radio spectrum to tell who it is that is interfering with them. So you can't complain to the FCC about it because you can't identify the station. And these stations keep transmitting over and over until you give up and move. Given that they already can't seem to hear me even when they are 20dB over to me I think it would be disastrous if these stations were allowed to pop-up anywhere in the current narrow band digital/CW sub-bands. The obvious effect would be that all current narrow band digital modes would be driven out.
- 4.) It appears to me that the combination of WinLink2000 and PacTorII/III on the HF Amateur Radio bands is an attempt to compete as a Common Carrier with readily available Commercial E-Mail services. A careful read of the WinLink WEB site and its Links seems to indicate an awful lot of e-mail being sent on the system daily. Mostly by Boaters and RVers that could and probably should be using a Commercial service. I have no doubt that the system works very well, and that in an Emergency situation it could be valuable – but I question whether it belongs in the Amateur Bands at all except during a declared emergency.
- 5.) A big claim to fame of the proponents of WinLink2000 and PacTorII/III is that their use in the Amateur Bands is advancing the art of radio through new experimentation. How can that be? PactorII/III are proprietary - you can't legally do anything here except pay a fee to use it. All the experimentation has been done and the modems are available to be bought/sold. Who benefits here Amateurs – the General Community - or a single company and its supporters? This appears to be most suited to channelized Commercial frequencies where WinLink PacTorII/III can be used to its full potential without interfering with anyone. As I said it already appears to work well (experimentation is done) – lots of daily traffic (most probably not of an Emergency Nature) competing with available Commercial Services.

I understand that there is a segment of the Amateur Radio community that wants WinLink and PacTorII/III (about 1% or 2% of active amateurs) – they should have a place as long as they are not competing with Commercial services, but that place should be well away from incompatible narrow band digital and cw sub-bands – and they should be required to share

the bands like everyone else. So until they can actually determine if a frequency is in use they should not be allowed open access to the Digital/CW sub-bands.

In closing I would ask that RM11306 and all changes made to it since its inception be denied. Until a more equitable proposal is submitted - one that takes into account the opinions of more than 1% or 2% of Amateurs.

Respectfully submitted
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